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February 29, 2012

**Via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**Re: VOIP360, Inc.  
(Form 499 Filer ID 826935)**

**2011 CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of VOIP360, Inc., and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's CPNI Certification for calendar year 2011.

Respectfully submitted,



Jean L. Kiddoo  
Brett P. Ferenchak

Counsel for VOIP360, Inc.

Enclosure

cc: Best Copy and Printing, Inc. (FCC@BCPIWEB.COM)

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011.

Date filed: February 29, 2012

Names of company covered by this certification:

VOIP360, Inc.

Form 499 Filer ID:

826935

Name of signatory: Scott E. Beer

Title of signatory: Vice President, General Counsel and Secretary

Certification:

I, Scott E. Beer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

  
\_\_\_\_\_  
Scott E. Beer

Vice President, General Counsel and Secretary

**CERTIFICATION OF CPNI FILING BY THE ZAYO GROUP ENTITIES**  
**FEBRUARY \_\_, 2012**  
**EB Docket No. 06-36; EB-06-TC-060**

**Statement of CPNI Procedures and Compliance**

VOIP360, Inc. (“VOIP360”) provides integrated voice (interconnected Voice Over Internet Protocol), data and video services to public and private sector companies.

VOIP360 does not use or permit access to CPNI to market any services outside of the “total services approach” as specified in 47 CFR §64.2005. Nor does VOIP360 allow affiliates or third parties access to CPNI for marketing-related purposes. If VOIP360 elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 et seq., including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. VOIP360 will develop and implement an appropriate tracking method to ensure that customers’ CPNI approval status can be verified prior to using CPNI for marketing-related purposes. VOIP360 will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes.

Consistent with the Commission’s rules, VOIP360 uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of VOIP360, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

VOIP360 does not engage in marketing when a customer makes an inbound call to VOIP360. Should the VOIP360 change this practice, the company will, in accordance with the CPNI rules, obtain a customer’s oral authorization that VOIP360’s customer service representatives may access a customer’s CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such VOIP360 representative will be required to provide the disclosures demanded by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

VOIP360 will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. In order to authenticate a customer’s identity prior to disclosing CPNI, VOIP360 authenticates the customer using a variety of methods. VOIP360 will inform customers of change of address in a manner that conforms with the relevant rules.

VOIP360 has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, VOIP360 will notify affected customers. VOIP360 will maintain a record of any CPNI-related breaches for a period of at least two years.

VOIP360 provides training concerning CPNI compliance. All employees of VOIP360 are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by VOIP360. Employees of VOIP360 who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.